

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

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ABDULRAHMAN ALHARBI,

Plaintiff,

– v. –

GLENN BECK; THE BLAZE, INC.;  
MERCURY RADIO ARTS, INC.; AND  
PREMIERE RADIO NETWORKS, INC.,

Defendants.

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CIVIL ACTION NO.  
1:14-cv-11550-PBS

**ASSENTED-TO MOTION FOR LEAVE TO FILE SUR-REPLY**

Pursuant to Local Rule 7.1(B)(3), Defendants Glenn Beck, TheBlaze Inc. (erroneously sued herein as “The Blaze, Inc.”), Mercury Radio Arts, Inc., and Premiere Radio Networks, Inc. (together, “Defendants”) request leave of this Court to file, by April 21, 2015, a sur-reply to Plaintiff Abdulrahman Alharbi’s (“Plaintiff”) Reply to Defendants’ Opposition to Motion for Leave to File Amended Complaint to Add Count of Unjust Enrichment Complaint. *Plaintiff assents to the relief requested in this Motion.* In further support of their request, Defendants state as follows:

1. On February 13, 2015, Plaintiff filed his Motion to Amend Complaint. *See* Docket Entry No. 40.
2. On February 27, 2015, Defendants filed their Opposition to the Motion to Amend Complaint (the “Opposition”). *See* Docket Entry No. 41.
3. On March 10, 2015, Plaintiff sought leave to file a reply to Defendants’ Opposition, which the Court granted the same day. *See* Docket Entry Nos. 42, 43.
4. On April 15, 2015, Plaintiff filed his Reply.

5. Defendants would appreciate an opportunity to address the contentions and allegations made in Plaintiff's Reply, which they could not have reasonably anticipated when they were preparing the Opposition.

6. Oral argument has not yet been scheduled. Granting leave to file a sur-reply to the Reply, therefore, will not prejudice either party.

7. Counsel for Plaintiff assents to the relief requested in this Motion.

WHEREFORE, Defendants respectfully request that the Court grant leave to file a sur-reply to Plaintiff's Reply on or before April 21, 2015.

Respectfully submitted,

GLENN BECK, THEBLAZE INC., MERCURY  
RADIO ARTS, INC., and PREMIERE RADIO  
NETWORKS, INC.,

By their attorneys,

/s/ Zachary C. Kleinsasser

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Dated: April 17, 2015

**LOCAL RULE 7.1 CERTIFICATE**

Pursuant to Local Rule 7.1, the parties met and conferred on April 16, 2015. Plaintiff assents to the relief requested in this Motion.

/s/ Zachary C. Kleinsasser

**CERTIFICATE OF SERVICE**

I, Zachary C. Kleinsasser, hereby certify that on April 17, 2015 this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing and that paper copies will be sent to those indicated as non-registered participants.

/s/ Zachary C. Kleinsasser